

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Plaintiff,

-against-

ANY AND ALL FUNDS ON DEPOSIT IN  
HUDSON VALLEY BANK, NA ACCOUNT NUMBER  
1200200301 HELD IN THE NAME OF KCP  
WINES & LIQUOR CORP., UP TO AND  
INCLUDING ONE HUNDRED FORTY THOUSAND  
TWO HUNDRED THIRTY-SIX DOLLARS AND TWO  
(ENV)

CENTS (\$140,236.02), AND ALL PROCEEDS  
TRACEABLE THERETO, AND

ANY AND ALL FUNDS ON DEPOSIT IN  
RBS CITIZENS BANK, NA ACCOUNT NUMBER  
4010165994 HELD IN THE NAME OF KCP  
WINES & LIQUOR CORP., D/B/A COLONIAL  
LIQUORS, UP TO AND INCLUDING ONE  
HUNDRED FIFTY THOUSAND DOLLARS AND NO  
CENTS (\$150,000.00), AND ALL PROCEEDS  
TRACEABLE THERETO,

Defendants In Rem.

Civil Action No. 11-02849

VERIFIED CLAIM

**VERIFIED CLAIM OF JIN SOON KWON PURSUANT TO  
RULE G(5) OF THE SUPPLEMENTAL RULES FOR  
CERTAIN ADMIRALTY AND MARITIME CLAIMS**

Pursuant to Supplemental Rule G(5) of the Supplemental Rules for Certain Admiralty and Maritime Claims (the "Supplemental Rules") Jin Soon Kwon asserts her interest in and right to accounts at RBS Citizens Bank, NA and Hudson Valley Bank, NA, and all funds seized from such accounts and named in the Government's Complaint. Jin Soon Kwon claims the right to defend in this action. In support of her assertion and claim, Jin Soon

Kwon states that:

1. The Claimant is Jin Soon Kwon.
2. Jin Soon Kwon is a principal of KCP Wines and Liquors Corp., d/b/a Colonial Liquors, located at 416 East Sanford Boulevard, Mt. Vernon, New York.
3. Jin Soon Kwon is a legal owner of the funds in the following bank accounts seized by the Government:
  - a. All funds held in account # XXXXXX0301 at Hudson Valley Bank, NA, Mount Vernon, New York ("ID Bank"), in the name of KCP Wines and Liquors Corp.
  - b. All funds held in account # XXXXXX5994 at RBS Citizens Bank, NA, Mount Vernon, New York, in the name of KCP Wines and Liquors Corp.
4. The Government named KCP Wines and Liquors' property as defendants in the Complaint and that property remains seized pending the resolution of forfeiture proceedings. Jin Soon Kwon is a shareholder and the President of KCP Wines and Liquors Corp., which does business as Colonial Liquors. Jin Soon Kwon is duly authorized by both Hudson Valley Bank NA and RBS Citizens Bank NA to make transactions in the respective accounts. Ms. Kwon claims ownership of the currency deposited in the above-listed accounts and therefore asserts her right to defend this forfeiture action.
5. Claimant hereby asserts a claim against the defendant property in its entirety, based on the grounds aforesaid.
6. Claimant timely files this claim pursuant to the Government's Rule G (4) (b) (i) Notice, dated July 6, 2011.


**VERIFICATION**

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed on July 18, 2011.

KCP WINES & LIQUOR CORP  
AND JIN SOON KWON

By: \_\_\_\_\_

  
Jin Soon Kwon  
Individually and as President  
of KCP Wines & Liquor Corp.

PATRICK R SMITH  
NOTARY PUBLIC, State of New York  
No. 01SM8093747  
Qualified in Westchester County  
Commission Expires June 09, 2015

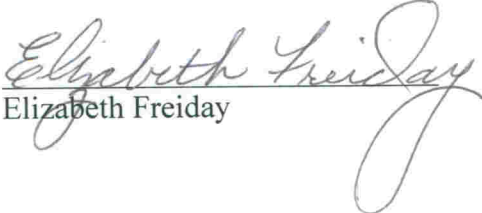


**CERTIFICATION OF SERVICE**

I hereby certify that on July \_\_\_\_, 2011, a copy of the Verified Claim of Jin Soon Kwon was served via certified mail upon:

Loretta E. Lynch  
United States Attorney - Eastern District of New York

Attention: Special Assistant United States Attorney  
Brian D. Morris  
United States Attorney's Office  
Eastern District of New York  
271 Cadman Plaza East 7th Floor  
Brooklyn, New York 11201

  
Elizabeth Freiday